

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:)	CHAPTER 11
)	CASE NO. 20-33948 (MI)
FIELDWOOD ENERGY LLC, <i>et al.</i> , ¹)	
DEBTORS.)	JOINTLY ADMINISTERED
)	

**PHILADELPHIA INDEMNITY INSURANCE COMPANY'S JOINDER TO THE
LIMITED OBJECTION OF ASPEN AMERICAN INSURANCE COMPANY, BERKLEY
INSURANCE COMPANY, EVEREST REINSURANCE COMPANY AND SIRIUS
AMERICA INSURANCE COMPANY TO DEBTORS' MOTION [ECF NO. 625]
SEEKING ENTRY OF AN ORDER EXTENDING THE EXCLUSIVE PERIODS
PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE**

Comes now, Philadelphia Indemnity Insurance Company (“Philadelphia”), by and through its undersigned counsel, and joins in the *Limited Objection of Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company and Sirius America Insurance Company to Debtors' Motion [Ecf No. 625] Seeking Entry of an Order Extending the Exclusive Periods Pursuant to Section 1121(d) of the Bankruptcy Code* (the “Limited Objection”) [Dkt Entry No. 686].

Philadelphia reserves all rights with respect to the Limited Objection and the *Debtors' Motion for Entry of an Order Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code* [Dkt Entry No. 625] (the “Exclusivity Motion”) including all rights arising under the Bankruptcy Code and applicable nonbankruptcy law.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

WHEREFORE, Philadelphia requests that: (i) the Exclusivity Motion be denied unless and until the issues highlighted in the Limited Objection are addressed and (ii) this Court grant such other and further relief to which Philadelphia may be entitled.

Respectfully submitted,

MANIER & HEROD, P.C.

/s/ Michael E. Collins

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and served upon all parties receiving notice pursuant to the CM/ECF system on December 22, 2020.

/s/ Michael E. Collins

Michael E. Collins